

BEFORE THE COLORADO AIR QUALITY CONTROL
COMMISSION COLORADO DEPARTMENT OF PUBLIC HEALTH
AND ENVIRONMENT

WORLDWIDE LIQUID SOLUTIONS, LLC - MOTION FOR MORE TIME AT THE
SCHEDULED HEARING

IN THE MATTER OF OIL & GAS RULEMAKING EFFORTS REGARDING PROPOSED
REVISIONS TO:
REGULATION NUMBER 3, PARTS A, B, AND C;
REGULATION NUMBER 6, PART A;
REGULATION NUMBER 7

Worldwide Liquid Solutions, LLC, by and through undersigned counsel,
respectfully requests that the Colorado Air Quality Control Commission ("Commission")
allow WLS additional time to present at the hearing scheduled for February 20-21, 2014,
for the following reasons.

On January 24, 2014, the Commission issued its Prehearing Order for Proceedings
Scheduled for February 19-22, 2014 ("Order"). Pages 3-4 of the Order set out the "Order of
Presentation and Allotted Time." The order grants WLS 20 minutes total time at the
hearing. WLS was denied an opportunity to present information regarding the Passive
Volatile Organic ("VOC") Absorption Filter ("PVOCAF") during the stakeholder process.
The 20 minutes allotted to WLS is too short a time frame to provide the Commission with
information about the PVOCAF and to meaningfully participate as a party in these
proceedings.

WLS's new technology makes WLS unlike any other party in these proceedings.
WLS cannot rely upon another party similarly situated to make a point that must be skipped
because lack of presentation time.

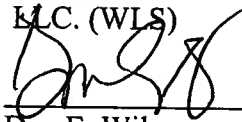
While WLS can and will rely upon other parties making legal challenges to the
rulemaking process, only WLS has scientifically challenged the additional secondary
pollution that will occur under proposed Rule 7, the potential to emit ("PET") thresholds and
the EPA Best System of Emission Reduction ("BSER") standards. The poor science
advocated by the Division in the rulemaking hearing should not be 'drowned out' by the
potential economic impact threatened to the industry and affected communities, or by the
groups granted private audiences with the Division staff and rule advocates.

It is in the best interests for all concerned that proposed air regulations actually improve air quality, and this cannot be determined unless the science of the proposal is reviewed in public.

The Procedural Rules expressly state that persons granted party status have the right to make an individual presentation either orally or in writing or both, during the rulemaking hearing. Rule V.E.3.a. The Procedural Rules also emphasize a policy that "*is well supported by technical and scientific data*". See, 5 C.C.R. 1001-1.

For these reasons, WLS respectfully requests that the Commission grant WLS an additional 40 minutes, 1 hour total, at the Commission Hearing.

Respectfully submitted this 4th day of February, 2014.

By: 
WORLDWIDE
LIQUID SOLUTIONS,
LLC. (WLS)
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CERTIFICATE OF SERVICE

This is to certify that I have duly served the within MOTION for more time upon all parties herein by e-mail or by depositing copies of same in the United States mail, first-class postage prepaid, at Denver, Colorado, this 4th day of February, 2014, addressed as follows:

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Local Community Organizations

(Includes the following parties: Grand Valley Citizens Alliances, Weld Air and Water, Community Alliance of the Yampa Valley, Citizens for Clean Air, Western Colorado Congress, and NFRIA-WSERC Conservation Center)

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Local Government Coalition (LGC)

(Includes the following parties: City and County of Denver, La Plata County, San Miguel County, Pitkin County, Boulder County, Adams County, City of Fort Collins, City of Boulder)

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s/ Rita Watson

